

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of

#### Comments of the United States Conference of Catholic Bishops

The United States Conference of Catholic Bishops (USCCB) supports the proposal by the Federal Communications Commission (the Commission) to adopt an online programming reporting obligation, which would include the currently required issues/program lists and, after the Commission has completed its work in MB Docket No. 11-189, In the Matter of Standardizing Program Reporting Requirements for Broadcast Licensees, a more complete online programming reporting requirement, which would include, as one of the categories of programming broadcasters may report to the public, religious programming.

USCCB is a nonprofit corporation organized under the laws of the District of Columbia. All active Catholic Bishops in the United States are members of the USCCB. USCCB advocates and promotes the pastoral teachings of the Bishops in such diverse areas as education, health care, social welfare, immigration, civil rights, family life and communications. USCCB has extensive experience producing, funding and distributing quality programming for television, radio, cable and the Internet. USCCB is committed to maintaining a place for religion and values on the public airwaves (and the Internet) and to programming that inspires, informs and educates.

Creation by the Commission of a streamlined online disclosure process is long overdue. In proceeding after proceeding, USCCB has informed the Commission of the increasing difficulty and financial burden it and Catholic dioceses face in obtaining airtime on local broadcast stations for full

length programs and even public service announcements. USCCB has expended scarce resources to gather and organize that information, but the Commission frequently has dismissed this information as "merely anecdotal." Requiring broadcasters to provide information online to the public and the Commission in a consistent and orderly format will supply the public and the Commission with a useable database of information about actual programs aired by broadcasters. That source of information supplied by the broadcasters themselves will allow the public, including USCCB, to participate in a meaningful way in license renewals and Commission proceedings.

In his message for the 40th World Communications Day, Pope Benedict XVI warned against the "distortion that occurs when the media industry becomes self-serving or solely profit driven, losing the sense of accountability to the common good." Online disclosure requirements move broadcasters closer to that sense of accountability.

USCCB urges the Commission to adopt an online programming reporting system for broadcast licensees.

Respectfully submitted,

Katherine G. Grincewich  
Associate General Counsel  
United States Conference  
of Catholic Bishops

December 22, 2011

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